IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JONATHON D. LONG,

Plaintiff,

v.

CITY OF CLARKSVILLE, TENNESSEE,

JOSHUA LAJOIE, individually and in his official capacity,

Defendants.

Case No. 3:22-cy-00267

Judge Aleta A. Trauger Magistrate Judge Barbara Holmes

DEFENDANTS' MOTION FOR PERMISSION TO EXCEED PAGE LIMIT FOR MEMORANDUM OF LAW IN SUPPORT OF MOTION TO DISMISS

Defendants City of Clarksville, Tennessee (hereinafter, the "City") and Joshua LaJoie (hereinafter, "Officer LaJoie") hereby respectfully move this Court for permission to exceed the twenty (20)-page limit for briefs as set forth in the Court's Practice and Procedure Manual, Section III(C)(3). Specifically, having already filed their Motion to Dismiss the Complaint, the City and Officer LaJoie now request permission to file their Memorandum of Law in support thereof, said Memorandum being attached hereto as **Exhibit 1**.

As grounds for this Motion, the City and Officer LaJoie would show that, given the numerous claims against them (both federal and state), as well as the nature of the Plaintiff's allegations, it is necessary for the Memorandum of Law to contain somewhat extensive detail and analysis.

Therefore, based on the foregoing, the City and Officer LaJoie respectfully request that the Court grant this Motion to Exceed Page Limit, allow said Defendants to exceed the page limit by

five (5) pages (not including the Certificate of Service), and deem **Exhibit 1** attached hereto as *filed*.

Respectfully submitted,

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Attorneys for Defendants

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing has been served on the parties by the U.S. District Court Electronic Filing System and/or has been mailed, by U.S. Mail, to the following:

Richard M. Brooks 130 Third Avenue West Carthage, TN 37030 Phone: (615) 735-0807 Fax: (615) 735-1921 utkrmb@comcast.net

on this the 10th day of June, 2022.

/s/ Jeff T. Goodson Jeff T. Goodson